

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

ELLIOT FERRELL,

Plaintiff,

v.

LABORERS' LOCAL No. 1149,

Defendant.

Civil Action No. 5 : 16 - cv - 55

PARTIES' JOINT MOTION TO APPROVE AND ENTER CONSENT DECREE

Plaintiff Elliot Ferrell and Defendant Laborers' Local No. 1149 (together, the "Parties") jointly move the Court to approve and enter the attached proposed Consent Decree ("Decree") resolving the above-captioned case. After engaging in settlement discussions, and to avoid the burdens of contested litigation, the Parties have agreed to the Decree. The Decree, if approved and entered by the Court, resolves all claims of Plaintiff raised in the Complaint in this action.

Date: April 18, 2016.

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